

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

CASE NO. 1:19-CV-593-LCB-JLW

ZION WILLIAMSON,

Plaintiff,

v.

PRIME SPORTS MARKETING, LLC, and
GINA FORD,

Defendants.

**PLAINTIFF'S
MOTION FOR SCHEDULING
CONFERENCE**

Now comes the Plaintiff, by and through undersigned counsel, and hereby submits this request for a Scheduling Conference, pursuant to Fed. R. Civ. P. 16 and 26 and Local Rules 16.1 and 26.1 of the Local Rules for the Middle District of North Carolina, to schedule discovery in this case. The accompanying Memorandum provides additional support for this Motion.

Pursuant to Local Rule 37.1, the undersigned certifies that counsel for Plaintiff, Jeffrey Klein, sent to counsel for Defendants a proposed joint motion to request a Scheduling Conference and, thereafter, consulted with counsel for Defendants, Willie Gary, Larry Strauss, Stephen Drummond, JoAnn Squillace, and Alvin Pittman, by telephone on February 28, 2020. Counsel for Plaintiff attempted to secure Defendants' consent to filing a motion to (i) discuss with the Court the scheduling of discovery of this case and (ii) coordinate discovery in this action with related litigation that Defendants

subsequently filed against Plaintiff in Florida. Counsel for Defendants did not consent to filing the motion.

WHEREFORE, Plaintiff requests that the Court enter an Order:

- (1) Scheduling a conference on or after March 9, 2020 to schedule discovery in this case.
- (2) Awarding Plaintiff such other and further relief as may be just and proper.

This 3rd day of March 2020.

/s/ John R. Wester

John R. Wester
N.C. Bar No. 4660
jwester@robinsonbradshaw.com
Robert E. Harrington
N.C. Bar No. 26967
rharrington@robinsonbradshaw.com
Fitz E. Barringer
N.C. Bar No. 42679
fbarringer@robinsonbradshaw.com
ROBINSON, BRADSHAW & HINSON, P.A.
101 N. Tryon St., Ste. 1900
Charlotte, North Carolina 28246
Telephone: 704.377.2536
Facsimile: 704.378.4000

Jeffrey S. Klein*
Jeffrey.Klein@weil.com
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Telephone: 212.310.8790
Facsimile: 212.310.8007

*Local Rule 83.1(d) Special Appearance

Attorneys for Plaintiff